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VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554

*RE: Inquiry Concerning Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion*

Dear Ms. Dortch,

The City of Arlington, Texas writes to express concern about the Federal Communications Commission's strategies for evaluating broadband deployment outlined in its Fourteenth Broadband Deployment Report Notice of Inquiry.

Access to affordable and reliable broadband remains a critical issue for millions of individuals in the United States. Being home to the Texas Rangers, Dallas Cowboys, Six Flags over Texas, Hurricane Harbor and other key entertainment venues for the North Texas region, planning for high volumes of people seeking mobile connection is necessary for the economic success of this area. The City of Arlington, however, understands that boosting mobile service is only one component of digital inclusion and connectivity for its community.

In order to ensure that the deployment of broadband services is being evaluated accurately, and that the FCC is taking the appropriate steps to address the country's digital divide, the FCC must consider the following:

- **Mobile service is a complement to, not a replacement for, fixed broadband.** Mobile service is integral to the lives of many. However, mobile service as it is currently available to consumers does not provide equitable access to the internet when compared to a fixed home connection. Significant limitations of mobile service, including prohibitive cost, unreliable service, data caps and limited accessibility, should disqualify mobile service as a substitute for fixed home broadband. Additionally, the FCC should not consider 5G services a substitute for fixed broadband, as 5G networks have not yet been commercially deployed.
- **Satellite is not broadband.** Satellite service is extremely unreliable, is expensive, has high latency, and is unable to support bi-lateral communication. Additionally, satellite plans often include restrictive data

- caps. Satellite should be evaluated separately from broadband deployment data.
- **FCC data vastly overstates the availability of broadband.** The FCC's Form 477 data overstates broadband deployment across the country. Not only does the data allow an entire census block to be marked "served" by broadband if one household is served by a single provider, but there is no data to evaluate price and no oversight of provider-reported speeds. The numbers produced by FCC data paint a picture distinct from the experience of availability by real individuals.

Over-reporting the availability of fast, affordable internet access in this country would limit funding and grant opportunities for communities, would lead to less useful legislation and FCC policies, and would discount the experiences of millions of Americans who live without competitive access to broadband. The FCC must be diligent in ensuring access to high-quality internet access for all.

Additionally, the order limits the ability of local governments to implement what is necessary in their communities in a way that they see best fit which does not account for community needs, jeopardizes public safety and unreasonably under-fees telecommunication companies for the use of public property. Local governments understand the needs of their community as they are a part of their community and experience those same problems. Just as Arlington recognizes the mobile service needs of its Entertainment District, other municipalities do the same to attract internet providers that can best meet the needs of the community. The restrictions the order places on cities ties the hands of local governments to provide necessary public services to residents.

Thank you for your attention to our concerns. I look forward to working with you on a more collaborative and balanced solution that encourages small cell deployment, looks to increase access to broadband, closes the digital divide and also protects local authority and all users of the public rights-of-way.

Sincerely,

A handwritten signature in black ink, appearing to read 'W. Jeff Williams', with a stylized, flowing script.

W. Jeff Williams, P.E.  
Mayor